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Leonard S. Sawicki Senior Manager

EX PARTE June 23, 1994

Mr. William F. Caton Secretary Federal Communications Commission Room 222 1919 M Street NW Washington, D.C.

Re: CC Docket No. 92-292

Dear Mr. Caton:

Today, David Jordan and I met with Linda Dubroof and Mary DeLuca of the Common Carrier Bureau. The purpose of the meeting was to review MCI's position in this proceeding and to discuss solutions for certain types of toll fraud. The attached material was used during the meeting. Besides the topics listed in the attached, we also covered fraud based on remote call-forwarding.

Sincerely,

Leonard S. Sawicki

Attachment

Ms. DeLuca

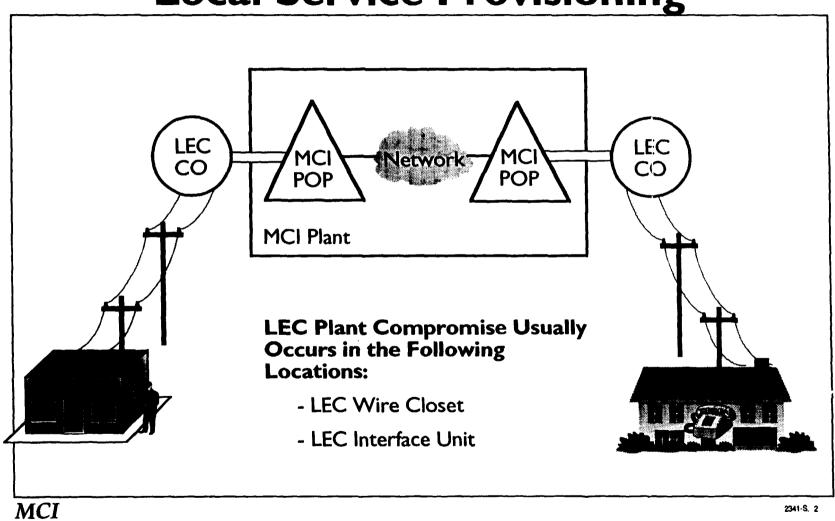
Ms. Dubroof

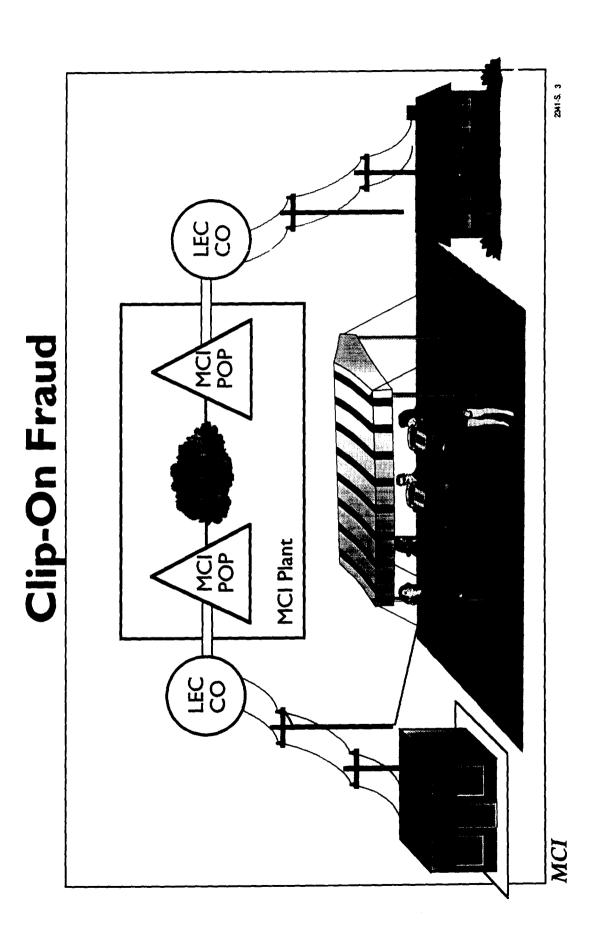
No. of Copies rec'd List ABCDF

# Managing Toll Fraud

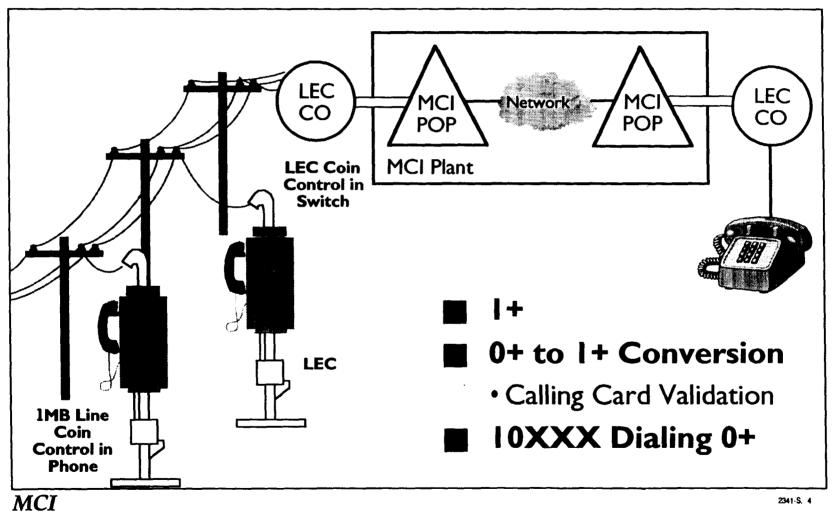
David Jordan Technical Security

**Local Service Provisioning** 





## **COCOT Call Flow**

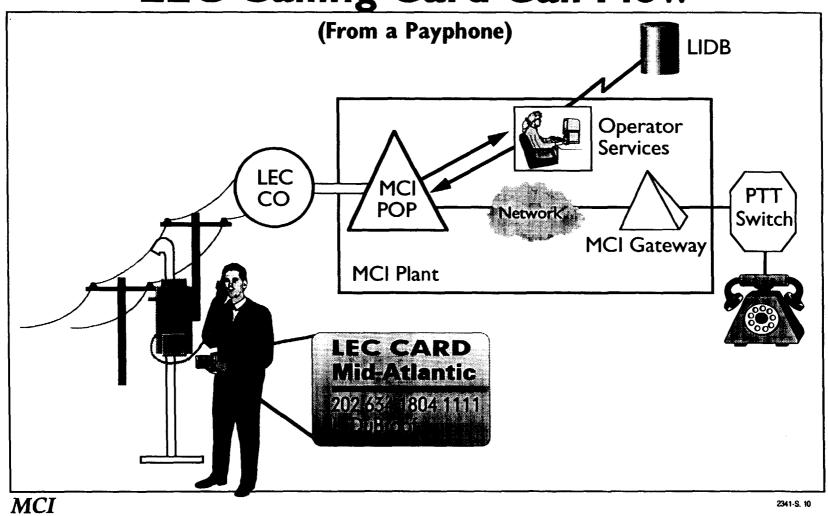


SE Fraudulent COCOT Call Flow POP POP MCI Plant MCI POP Coin Control in Payphone SE Telco DEMARC MCI

# **COCOT** with Non-PIC Option

- Does Remove Financial Responsibility for Fraud from the COCOT?
- Non-PIC Option Offered by LEC's Doesn't Prevent Fraud
- Fraud Perpetrators Are Free to Dial 10XXX I+
- The Non-PIC Option Should Prevent Long Distance Dialing Altogether

# LEC Calling Card Call Flow

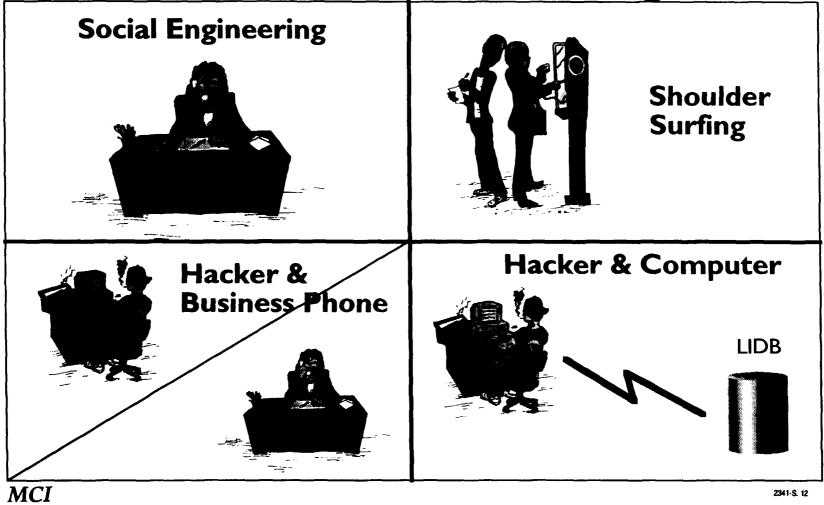


### **LEC Card Product - Fraud Risk Concerns**

- LIDB/LERG Information Is Not Always Accurate
- Poor Business Office Practices Leads to Fraudulent Use of LEC Cards

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# Fraudulent Use of LEC Calling Card



### LEC Card Product - Fraud Risk Concerns

- LIDB/LERG Information Is Not Always Accurate
- Poor Business Office Practices Leads to Fraudulent Use of LEC Cards
- MCI Pays Access Fees and LIDB Fees Regardless of the Collection Outcome
- MCI Carries the Risk Associated with Fraudulent Traffic Billed to LEC Cards, and Line Numbers

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2078.8

### Other Fraud Prevention Mechanisms

- Info Digits Were Assigned Based on the Value Associated with the Identification of High Fraud Risk Line Number Originations. National Forum ICCF Approved These Assignments Last Year. However, the LECs Now Want the IC's to Fund the Implementation of the Valuable Info Digits.
- DTRO/CO Upgrade
- All PINs Fail
- **Recognition Tone for Payphones**

# **Subscription Fraud**

- Collect and Verify Subscription Information on All New Accounts
- **Cross Reference Related Accounts**
- Authenticate Calling Party on All Account Changes
- Monitor Credits
- **Utilize National Bad Debt Data Base**

# **Subscription Fraud**

- **Share Customer Information**
- Alarm Suspect Equipment Installations
- Toll Denial for Non-Payment
- Utilize Bad Debt Data Base

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# **Subscription Fraud**

### Detect Suspect Installation Request

- Invalid Customer Information
- High Risk Accounts
  - Outstanding Balance
  - No Credit History
  - High Risk Feature-Set
  - Multiple Accounts
  - 20 Lines for a Two Bedroom Apartment